IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA ALEXANDRIA DIVISION

A	D	EI	JA	B	LA	IN	K	EN	SI	HIP

Docket No. 1:23-cv-1328

Plaintiff

v.

YESENIA LASSITER

Defendant

FIRST DECLARATION OF MICHAEL KEITH BLANKENSHIP

- I, Michael Keith Blankenship, declare that if called to testify, I would testify to the best of my information and belief as follows:
- 1. I am the attorney in charge of the case of the Plaintiff, and of all facts set forth in this Declaration and, if called upon, could competently testify to those facts. I am over 18 years of age and am qualified to testify.
 - 2. I am familiar with the casefile of the present litigation.
- 3. I was with the Plaintiff in her testimony concerning the agency action of December 5, 2023, when Plaintiff was asked by Defendant in a state agency action concerning alleged malfeasance concerning Plaintiff's treatment of the Daughter of the present action.
- 4. Defendant tendered a letter concerning statements related to the alleged infirmities of the Daughter (as described in the Complaint of the present litigation). The medical doctor that

alleged the infirmaties was a Doctor Federici. This Doctor was suspended by the Virginia medical board. See Exhibit 1.

- 5. The basis of the suspension of Dr. Federici is unorthodox and based on pseudo-science. Multiple groups have emerged to contest the claims of Dr. Federici. See e.g., Exhibit 2.
- 6. One basis of claims against Plaintiff was that she would not credit in total the claims of Dr. Federici, based on the Prince William County's independent, objective diagnosis of the alleged infirmities.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this January 5th, 2024

By:

Michael Keith Blankenship